

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACKSONVILLE POLICE AND FIRE PENSION FUND, on behalf of itself and all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC., MARTIN SULLIVAN, STEVEN BENSINGER, JOSEPH CASSANO, and ROBERT LEWIS,

Defendants.

JAMES CONNOLLY, Individually and on behalf of all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC., MARTIN J. SULLIVAN, STEVEN J. BENSINGER, JOSEPH J. CASSANO, ROBERT E. LEWIS, and DAVID L. HERZOG,

Defendants.

CIV. NO. 08-CV-4772

Hon. Richard J. Sullivan

THE CITY OF SAGINAW POLICE AND FIRE PENSION BOARD'S MOTION FOR CONSOLIDATION OF ALL RELATED ACTIONS, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL

CIV. NO. 08-CV-5072

Hon. Richard J. Sullivan

MAINE PUBLIC EMPLOYEES
RETIREMENT SYSTEM, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC., MARTIN SULLIVAN,
STEVEN BENSINGER, JOSEPH
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5464

Hon. Richard J. Sullivan

ONTARIO TEACHERS' PENSION PLAN
BOARD, on behalf of itself and all others
similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC., MARTIN SULLIVAN,
STEVEN BENSINGER, JOSEPH
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5560

Hon. Richard J. Sullivan

**THE CITY OF SAGINAW POLICE AND FIRE PENSION BOARD'S MOTION
FOR CONSOLIDATION OF ALL RELATED ACTIONS, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that the City of Saginaw Police and Fire Pension Board (“SPFPB”) will and hereby does move this Court on a date and at such time as may be designated by the Court, for an order: (i) consolidating all related actions; (ii) appointing the SPFPB as the Lead Plaintiff in the consolidated action and any subsequently filed related cases, and (iii) approving its selection of Lockridge Grindal Nauen P.L.L.P. and Mager & Goldstein LLP to represent it as Co-Lead Counsel. In support of this Motion, the City of Saginaw Police and Fire Pension Board submits the accompanying memorandum of law and the Affidavit of Lisa M. Pollard.

DATED: July 21, 2008

Respectfully Submitted,

/s/ Lisa M. Pollard

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[Proposed] Co-Lead Counsel